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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*Brittany Doffing*, 4:22-cv-05892;

*Malinda Harris*, 4:22-cv-06085;

*Ayla Tanton*, 4:22-cv-06545;

*Megan Waddell*, 4:22-cv-05888;

*Virginia Roth*, 4:22-cv-05884;

*Cecelia Tesch*, 4:22-cv-06167;

**DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBITS TO THE *CORRECTED*  
SUPPLEMENTAL DECLARATION OF  
JENNIE LEE ANDERSON IN SUPPORT  
OF PLAINTIFFS' CONSOLIDATED *EX  
PARTE* APPLICATION FOR  
APPOINTMENT OF GUARDIANS *AD  
LITEM***

1 *Apriel Dorsey*, 4:22-cv-06451;  
2 *Damian Johnson (and as next of friend to*  
3 *minors K.L.J., J.A.J., and K.A.J.)*, 4:22-cv-  
4 06418;  
5 *E.W.*, 4:22-cv-04528;  
6 *M.C.*, 4:22-cv-04529;  
7 *T.K.*, 4:22-cv-04588;  
8 *T.R.*, 4:22-cv-04712;  
9 *C.C.*, 4:22-cv-04709;  
10 *J.H. (and as next of friend to minors N.R.*  
11 *and A.M.)*, 4:22-cv-04710;  
12 *Shaw Jamerson*, 4:22-cv-06384;  
13 *L.A.T. (and as next of friend to minors P.T.*  
14 *and L.T.)*, 4:22-cv-04937;  
15 *S.R.*, 4:22-cv-06455;  
16 *Andrea Harrison*, 4:22-cv-06452;  
17 *Bethany Odems*, 4:22-cv-06440;  
18 *Sabrina Huff-Young*, 4:22-cv-06430;  
19 *Luvonia Brown*, 4:22-cv-06668;  
20 *Tabitha Quinones*, 4:22-cv-06431;  
21 *Shanetta Kimber (and as next friend to minor*  
22 *D.K.)*, 4:22-cv-06434;  
23 *Mandy S. Westwood*, 4:22-cv-06461;  
24 *Robert Turgeon*, 4:22-cv-06616;  
25 *Angela Canche*, 4:22-cv-06449;  
26 *Bernard Cerone*, 4:22-cv-06417;  
27 *Jennifer Koutsouftikis*, 4:22-cv-06643;  
28

1 *T.S.*, 4:22-cv-06454;  
 2 *Chad Smith*, 4:22-cv-06421;  
 3 *Stoudemire (on behalf of De'John*  
 4 *Davidson)*, 4:22-cv-06495;  
 5 *Stoudemire (on behalf of Ja'Taasha*  
 6 *Davidson)*, 4:22-cv-05987;  
 7 *Tiffany Woods*, 4:22-cv-6591;  
 8 *V.P.*, 4:22-cv-06617;  
 9 *J.O.*, 4:22-cv-05546;  
 10 *Rossana Agosta*, 4:22-cv-05565;  
 11 *M.F., B.F., A.F.*, 4:22-cv-05573;  
 12 *Nicholas Calvoni*, 4:22-cv-05873;  
 13 *Dayna Page*, 4:22-cv-06124;  
 14 *Sarie Neave*, 4:22-cv-06126;  
 15 *Julie Kosiorek*, 4:22-cv-06142;  
 16 *Zakey Amacker*, 4:22-cv-06150;  
 17 *Tracy Hunt*, 4:22-cv-06155;  
 18 *Tamesha Hicks*, 4:22-cv-06162;  
 19 *D.D., G.D.*, 4:22-cv-06190;  
 20 *Amanda Duke*, 4:22-cv-06200;  
 21 *Danielle Cohen*, 4:22-cv-06207;  
 22 *Kenisha Day*, 4:22-cv-06215;  
 23 *I.A.*, 4:22-cv-06252;  
 24 *Margit LaBlue*, 4:22-cv-06256;  
 25 *Khymberly Levin*, 4:22-cv-06263;  
 26 *Christian Brooks*, 4:22-cv-06308;  
 27 *Michelle Wheeldon*, 4:22-cv-06306;  
 28

*Jessica Bright*, 4:22-cv-06318;  
*Rachelle Capka*, 4:22-cv-06583;  
*Lawanda Simpson*, 4:22-cv-06587;  
*Jeffrey Wombles*, 4:22-cv-06685;  
*Melanie Clarke-Penella*, 4:22-cv-06692;  
*Lorine Hawthorne*, 4:22-cv-06751;  
*Chris J. Czubakowski*, 4:22-cv-06989;  
*C.U.*, 4:22-cv-07347;  
*N.W.*, 4:22-cv-08937;  
*David Hemmer*, 4:23-cv-00055;  
*C.N.*, 4:22-cv-04283;  
*Star Wishkin*, 4:22-cv-06459;  
*Donna Copelton*, 4:22-cv-06165;  
*Diane Williams*, 4:22-cv-05886;  
*J.A., K.L., and A.L.*, 4:23-cv-00515;  
*G.W.*, 4:23-cv-00545;  
*Elizabeth Mullen*, 4:23-cv- 00600;  
*A.C.*, 4:23-cv-00646;  
*D.D., J.D.*, 4:22-cv-06205;  
*Jessica Guerrero*, 4:22-cv-05894;  
*Stephanie Carter*, 4:22-cv-05986;  
*Kelli Cahoone*, 4:22-cv-06117;  
*Kim Isaacs*, 4:22-cv-05885;  
*Edyta Lee*, 4:22-cv-06426;  
*Shanetta Kimber (I)*, 4:22-cv-06498;  
*Debra Hudson*, 4:22-cv-06296;  
*Veronica Hicks*, 4:22-cv-06627;

Donavette Ely, 4:22-cv-06067

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiff's Consolidated *Ex Parte* Application for Appointment of Guardian *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs' Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Revised Exhibits attached to the *Corrected* Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiffs' Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson *Corrected* Supplemental Declaration").

4. True and correct copies of the following Revised Exhibits to the Support of Anderson *Corrected* Supplemental Declaration are as follows and filed herewith:

- a. *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545 (Revised Exhibit 3);
- b. *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888 (Revised Exhibit 4);
- c. *Johnson (and as next of friend to minors K.L.J., J.A.J., and K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418 (Revised Exhibits 8, 9 and 10);
- d. *E.W. v. YouTube, LLC, et al.*, 4:22-cv-04528 (Revised Exhibit 11);
- e. *M.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04529 (Revised Exhibit 12);

- f. *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588 (Revised Exhibit 13);
- g. *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709 (Revised Exhibit 15);
- h. *J.H. (and as next of friend to minor N.R.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 16);
- i. *J.H. (and as next of friend to minor A.M.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04710 (Revised Exhibit 17);
- j. *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384 (Revised Exhibit 18);
- k. *L.A.T. (and as next of friend to minor L.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937 (Revised Exhibit 19);
- l. *S.R. v. Meta Platforms, Inc., et al.*, 4:22-cv-06455 (Revised Exhibit 20);
- m. *Woods v. Meta Platforms, Inc., et al.*, 4:22-cv-6591 (Revised Exhibit 36);
- n. *V.P. v. Meta Platforms, Inc., et al.*, 4:22-cv-06617 (Revised Exhibit 37);
- o. *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546 (Revised Exhibit 38);
- p. *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565 (Revised Exhibit 39);
- q. *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573 (Revised Exhibit 40);
- r. *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873 (Revised Exhibit 41);
- s. *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150 (Revised Exhibit 45);
- t. *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162 (Revised Exhibit 47);
- u. *D.D., G.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06190 (Revised Exhibit 48);
- v. *I.A. v. Meta Platforms, Inc., et al.*, 4:22-cv-06252 (Revised Exhibit 52);
- w. *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263 (Revised Exhibit 54);
- x. *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306 (Revised Exhibit 56);
- y. *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685 (Revised Exhibit 60);
- z. *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692 (Revised Exhibit 61);
- aa. *C.U. v. Snap Inc, et al.*, 4:22-cv-07347 (Revised Exhibit 64);
- bb. *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886 (Revised Exhibit 67);

cc. *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165 (Revised Exhibit 68);  
 dd. *J.A., K.L., and A.L. v. TikTok, et al.*, 4:23-cv-00515 (Revised Exhibit 69);  
 ee.  
 ff. *G.W. v. Snap, Inc.*, 4:23-cv-00545 (Revised Exhibit 70);  
 gg. *L.A.T. (as next of friend to P.T.) v. Meta Platforms, Inc., et al.*, 4:22-cv-04937  
 (Revised Exhibit 71);  
 hh. *A.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-00646 (Revised Exhibit 73);  
 ii. *Wishkin v. Meta Platforms, Inc., et al.*, 4:22-cv-06459 (Revised Exhibit 74);  
 and  
 jj. *D.D., J.D. v. Meta Platforms, Inc., et al.*, 4:22-cv-06205 (Revised Exhibit 75).

5. Pursuant to Civil Local Rule 7-11, I contacted Liaison Counsel for Defendants on March 27, 2023, to ask Defendants to stipulate that these documents may be filed under seal. Liaison Counsel confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Dated: March 28, 2023

Respectfully submitted,

/s/Jennie Lee Anderson  
 Jennie Lee Anderson  
 Plaintiffs' Liaison Counsel

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